

Message

From: Klepp, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1857DAFCBCC441888C06A473F38D0D93-BKLEPP]
Sent: 11/7/2019 5:58:28 PM
To: Johnstone, Lauren [Johnstone.Lauren@epa.gov]
Subject: Ex. 5 AC/AWP/DP Ex. 7(A) 7(E)
Attachments: 2016-11971.pdf; Chapter_3_-_Well_Completions.pdf

From: Mia, Marcia <Mia.Marcia@epa.gov>
Sent: Wednesday, February 6, 2019 12:02 PM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Klepp, Robert <Klepp.Robert@epa.gov>
Subject: Ex. 5 AC/AWP/DP Ex. 7(A) 7(E)

Artificial Lift from 2016 Final Rule:

Commenters asserted that many oil reservoirs have pressure that is insufficient for wells to naturally flow even after hydraulic fracturing. The commenters stated that this can be evidenced by the prevalence of artificial lift equipment such as rod pumps visible across the landscape of many oil producing areas. The commenters cited examples of reservoirs such as the Permian Basin, where horizontal drilling is used to extend the life of existing producing formations. The commenters explained that many oil wells that are hydraulically fractured do not have sufficient reservoir pressure to flowback fracture fluids. One company estimated that 30 percent of its hydraulically fractured horizontal wells and 80 percent of its hydraulically fractured vertical wells in the Permian Basin require artificial lift to flowback. In these cases, the commenter explained, rod pumps are installed on the wells to artificially lift the fracture fluids to the surface. In light of the comments received, the EPA believes that wells that require artificial lift equipment for flowback of fracture fluids should be classified as low pressure wells, as we believe that performing a REC is technically infeasible for these wells. (81 FR 35854)

and see page 36 of the RTC (Comment 60/API); page 61 (Comment 62/TXOGA)– clearly speaking of “mechanical artificial lift” and “equipment” needed for the lift – not gas lift.

Marcia B Mia
Air Branch
Office of Compliance
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.

-----Original Appointment-----

From: Hoyt, Daniel
Sent: Tuesday, January 29, 2019 1:57 PM
To: Hoyt, Daniel; Mia, Marcia; Williams, Christopher; Klepp, Robert
Subject: Hilcorp 114
When: Wednesday, February 06, 2019 10:30 AM-11:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: DCRoomARS1142/DC-ARIEL-RIOS-OECA-OCE